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VIA ECF

The Honorable Lorna G. Schofield
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: SEC v. Qin, 20-cv-10849 (LGS): Letter Motion for Extension of Fee Application

Dear Judge Schofield:

We are counsel to Robert A. Musiala Jr., Esq., Court-appointed Receiver in the above-referenced matter. We write pursuant to Rule I.B.2 of Your Honor's Individual Rules and Procedures for Civil Cases to respectfully request a permanent extension of forty-five (45) days to the current deadlines for the Receiver to file a Quarterly Fee Application. Per the Order Appointing Receiver, the Receiver must file a Quarterly Fee Application “[w]ithin forty-five (45) days after the end of each calendar quarter.”¹ The Receiver, however, needs additional time to finalize and submit the Quarterly Fee Applications because, as evidenced by the Receiver’s status reports to the Court, the Receiver continues to work diligently to timely discharge his Court-mandated duties and maximize the recovery of assets that will ultimately be returned to injured investors. The process of preparing invoices and the fee application on behalf of counsel to the Receiver and Retained Personnel is time-consuming as records continue to be voluminous.

Under this proposed permanent extension, the deadline for the Receiver’s upcoming Quarterly Fee Application, which is currently due on November 15, 2021, would be extended to December 30, 2021 (*i.e.*, ninety (90) days after the end of the third calendar quarter in 2021) and all other similar deadlines in the future would be extended to ninety (90) days after the end of each calendar quarter.

¹ Order Appointing Receiver ¶ 52, *SEC v. Qin*, No. 20-cv-10849 (LGS) (S.D.N.Y. Jan. 21, 2021), ECF No. 31.

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This is the Receiver's third request for an extension of time to file the Quarterly Fee Application. All prior requests by the Receiver for extensions to file the Fee Application have been granted. Plaintiff Securities and Exchange Commission consents to this request.

We thank the Court in advance for its consideration of the Receiver's request for a permanent extension of time to file each Quarterly Fee Application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Marco Molina".

Marco Molina
Partner